

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Louis Rivera, being first duly sworn, do hereby depose and state that:

Introduction and Agent Background

1. I am a Special Agent (SA) with Homeland Security Investigations (HSI) in San Juan, Puerto Rico (PR). I have been employed with HSI since March 2019. I am currently assigned to Seaport-Border Enforcement Security Task Force (BEST), which primarily investigates the smuggling of shipments of drugs into Puerto Rico, the transshipment of drugs to the continental United States, and the laundering of drug proceeds using bulk cash smuggling and other sophisticated money laundering activities. I was previously employed as a Customs and Border Protection Officer in Baltimore, Maryland for approximately four years. I earned a Master's Degree in Homeland Security Studies from The George Washington University, Washington, DC.
2. I graduated from the twelve (12) week "Criminal Investigator Training Program" and the sixteen (16) week "Homeland Security Investigations Special Agent Training Academy" conducted at the Federal Law Enforcement Training Center (FLETC) in Glynco, GA. I have received training and have participated in criminal investigations, including investigations relating to the reentry of previously removed aliens, narcotics smuggling, money laundering and related financial investigations, aiding and harboring of aliens smuggled into U.S. jurisdiction, and production of child pornography, among others.
3. I have participated in narcotics investigations as the case agent. I have debriefed defendants, witnesses, and informants who had personal knowledge of major narcotics trafficking organizations. Additionally, I have participated in many aspects of narcotics and money laundering investigations, including conducting physical surveillance, writing and executing search warrants that have led to seizures of narcotics, firearms, and other contraband, interviews of informants and cooperating witnesses, controlled drug purchases, consensual monitoring and recording of telephonic and non-telephonic communications, and analyzing telephone pen

register and caller identification system data. I have testified in judicial proceedings for violations of laws concerning controlled substances.

4. Based on my training, experience, and information from other investigators, I am familiar with narcotics traffickers' methods of operation, including the distribution, storage, and transportation of narcotics, and the collection of money proceeds of narcotics trafficking.
5. I am also familiar with methods employed by large narcotics organizations to thwart detection by law enforcement, including the use of vague and coded language, debit calling cards, cellular telephone technology, counter surveillance, false or fictitious identities, encrypted mobile applications, and encoded communications.
6. This Affidavit is submitted for the limited purpose of establishing probable cause. Therefore, I have not included all details of this investigation. I am familiar with the information contained in this Affidavit, either through personal investigation, discussions with other law enforcement officers, or information received from investigative resources.
7. This affidavit is submitted in support of a criminal complaint charging Carmelo LIRIANO-Martinez with violations of 21 U.S.C. §§ 841(a)(1), 846, 952(a) and 963: Conspiracy to Possess with Intent to Distribute a Controlled Substance and Conspiracy to Import a Controlled Substance.

Facts in Support of Probable Cause

8. During the morning of August 14, 2023, at approximately 8:45 a.m., United States Customs and Border Protection (CBP) Officers were conducting a routine inspection of vehicles and passengers arriving onboard Marine Vessel Kydon (hereinafter referred to as MV KYDON) located at Pan American Dock in San Juan, Puerto Rico (PR). MV KYDON had arrived from the port of Santo Domingo, Dominican Republic (DR).

9. CBP Officers encountered arriving passenger identified as Carmelo LIRIANO-Martinez driving a white 1998 Ford Econoline Cargo Van with Puerto Rico license plate #881-123 (hereinafter referred to as TARGET VEHICLE). LIRIANO-Martinez presented registration and title showing ownership of the TARGET VEHICLE.
10. LIRIANO-Martinez informed the CBP Officers he was coming back from DR after he had transported used appliances, groceries, and other household goods, from PR to DR. LIRIANO-Martinez stated he charged customers a fee for each box of merchandise being shipped from PR to DR and delivers the merchandise himself.
11. During a secondary inspection of the TARGET VEHICLE, CBP Officers observed anomalies on the chassis and floor area of the TARGET VEHICLE. CBP Officers utilized a fiber optic scope tool detect the anomalies. Subsequently, canine assistance was requested. A canine, trained to alert to the odor of narcotics, conducted a sniff of the TARGET VEHICLE. According to the canine handler, the canine alerted to the TARGET VEHICLE's chassis area.
12. CBP Officers began to remove the van bed linen and discovered after-market installed compartments with bricks of suspected contraband. The bricks were removed and contained a white powdery substance. A field-test was conducted and yielded positive results for the presence of cocaine. A total of 28 packages were retrieved from the compartments in the floor area of TARGET VEHICLE. The approximate total weight of the bricks was about 11.8 kilograms.
13. HSI agents arrived on scene and conducted an interview of LIRIANO-Martinez. LIRANO-Martinez was advised of his Miranda warnings and admitted his knowledge of the cocaine and that he was being paid to transport cocaine from DR to PR.

14. Exhibit A: Cargo area of TARGET VEHICLE with bed linen.



15. Exhibit B: Cargo area of TARGET VEHICLE without bed linen.



16. Exhibit C: Floor cargo area of TARGET VEHICLE with after-market compartments concealing packages of cocaine.



Conclusion

17. I believe there is probable cause to believe that LIRIANO-Martinez committed a federal felony offense violation of 21 U.S.C. §§ 841(a)(1), 846, 952(a) and 963: Conspiracy to Possess with Intent to Distribute a Controlled Substance and Conspiracy to Import a Controlled Substance.

LOUIS G
RIVERA

Digitally signed by LOUIS
G RIVERA
Date: 2023.08.15
09:18:13 -04'00'

Louis Rivera
Special Agent
Homeland Security Investigations (HSI)

Sworn in accordance with the requirement of Fed. R. Crim. P. 4.1. by telephone at 12:06 pm on this 15th day of August, 2023, in San Juan, Puerto Rico.

Hon. Giselle Lopez-Soler
United States Magistrate Judge
United States District Court
District of Puerto Rico